

RECEIVED

JUN 12 2014

AT 8:30 _____ M
WILLIAM T. WALSH CLERK

Wayne A. Philp
9984 Twin Lakes Drive
Coral Springs, Florida 33071
954.977.4693 (C); 954.345.0362 (H);
philpcdom@yahoo.com

June 10th, 2014

VIA E-MAIL & FED EX

Honorable Joel A. Pisano, U.S.M.J

Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: Philp (Plaintiff), pro se vs.
Ross University School of Medicine, et al (Defendants).
Civil Action Case Number: 3:14-cv-00556-JAP-DEA**

Dear Honorable Judge Pisano:

Please excuse me if this letter is not according to the proper steps/protocol for communications to your court.

In light of the defendants' motion to dismiss my complaint and after reading the statements presented by the defendants' attorney in support of that motion, I feel there are few important points I must bring to the Court's attention as that motion is considered.

From the age of 14 I began specifically studying the Sciences, and in those subjects, not in Law, I am educated, proficient, and competent. Against me, the defendants' attorney is certainly the champion. Yes, I have presented my civil case to the Court with some flaws and weaknesses, which the defendants' attorney has sought to tactfully exploit.

However, isn't that why we have our Courts? To preserve, protect, and promote what is in the best interests of our society. To level the playing field between the champion and the amateur; to assure a balance between the powerful and the weak; to uphold the rights of individuals when there is an unjust and unconscionable onslaught upon and obliteration of such those rights; to restrain the aggressor and restore the victim.

In total, my student loans are over \$100, 000.00 and approaching \$200,000.00. How am I going to payback this large loan?

What kind of society would we have when individuals are unjustly robbed of the opportunity and means to repay back such large loans?

What kind of society would we have when Universities can take thousands of dollars from individuals, never giving these individuals the education promised, but acquiring financial gains by such fraudulent means and then resting on the conviction that they will

have complete victory and affirmation owing to the victims' inability to fund and/or execute the necessary legal recourse?

What kind of society would we have if a group of "school administrators", with blatant conflict of interests, can sit in conspiracy and decide to deny individuals the earned opportunity to realize their God-given potentials and deny society the opportunity to benefit from such realized potentials?

My expulsion on March 1, 2007, from Ross **was callous, cruel, unjust, unlawful, and most egregious.**

That expulsion, part of a larger fraud by Ross and an action I view as a crime, victimized and greatly angered me. It took me significant time to (a) reorient myself as I had to come back home from Dominica to Florida, arriving on April 22, 2008, regroup myself, and continue with my life and (b) deal with, address, and resolve that anger. This contributed to my delay in coming before this Court earlier.

On searching I eventually made contact around May 2011 with Glantzlaw (prepaid legal services). They wrote a few letters to Ross on my behalf and referred me to some law firms, but gave me no adequate legal advice, and certainly none about "statute of limitation". The fact that I wrongly filed (April 2, 2013) my case in the US District Court in Florida attest to the quality of legal advice and service I received. Additionally, I encountered a legal culture where all the attorneys I spoke with wanted thousands of dollars up front ("retainer fee") before they would help me. This further contributed to my delay in coming before this Court earlier.

Another and a major factor that contributed to my delay in coming before this Court earlier is that I had no real and concrete reason from Ross for the expulsion. I really did not know how and upon what grounds to prepare a case for the Court. Additionally, I was hoping that with the virtue of time it would be seen that I caused absolutely no harm to the medical school and that Ross, from good conscience, would overturn the expulsion.

In his July 8, 2011 letter to Ross, Glantzlaw attorney Gonzalo Macchi requested specific information from Ross's President Dr. Thomas Shepherd and Dean Mary Coleman per school policy/student handbook violations and/or the reasons that warranted the expulsion. Responding for Ross in his August 22, 2011 letter, attorney William Gyves (Epstein, Becker, & Green, P.C.) provided no such specific information, but stated "this matter remains under review." I was kept devoid of real facts and that significantly hindered me from filing a correct law suit.

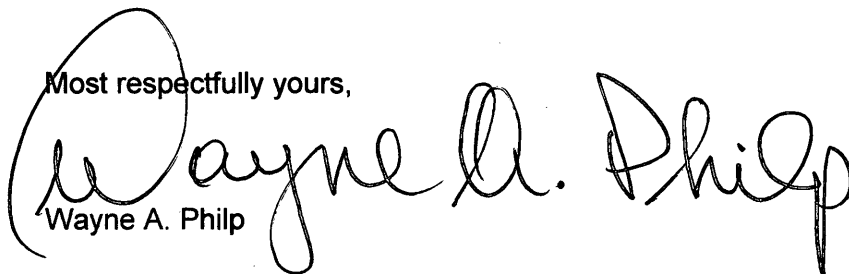
In the present document submitted by Ross's attorneys to support their motion for dismissal, I learned another troubling fact, that at the time of my attendance a group of fellow student at Ross petitioned the school to have me removed. Why and for what reason? I do not know. While at Ross no such group action was mentioned to me; I never sat before any student body (Honor Council); and I never sat before any group of students as my accusers. Again, another episode of Ross Administration's withholding information from me such that I was kept in ignorance and such that I could never prepare a proper defense for myself.

What happened to me at Ross University School of medicine and what the school's Administration subjected me to was absolutely wrong, involves a fraud, was for me a crime, deprived me of fundamental fairness, violated my rights, deprived me of my professional education and the benefits thereof.

I ask Your Honor to not dismiss this case, but to grant the opportunity to hear more details, substantially more details, of what happened and to more closely examine what the defendants did to me at Ross University School of Medicine.

Please see the attached chronology of events, detailing the happenings to and behaviors towards me.

Most respectfully yours,

A handwritten signature in black ink that reads "Wayne A. Philp". The signature is written in a cursive style. The first name "Wayne" is written with a large, looping "W". The middle initial "A." is written with a large, looping "A". The last name "Philp" is written with a large, looping "P". The signature is written over the text "Most respectfully yours,".

Wayne A. Philp

Cc: Attorney Robert M. Travisano (Email and Fax)

A CHRONOLOGY OF EVENTS, HAPPENINGS, AND BEHAVIORS TO ME DURING MY TIME A ROSS UNIVERSITY SCHOOL OF MEDICINE.

[A] THE FOLLOWING HIGHLIGHTS WHAT I ENDURED WITH AND THE BEHAVIOR OF THE RUSM GRIEVANCE COMMITTEE:

- Dr. Raymond Adebiyi's 1.24.2006 email to me had "Subject: Complaints" and read:

Dear Mr. Philip, Please make an appointment to speak with me today, Tuesday 24 January, anytime before 4.00pm. Please call Ms Bertrand at 255 6238. I look forward to seeing you. Best wishes.

- A 4.6.2006 memorandum from Dr. Adebiyi to Executive Dean Rios had "Subject: Mr. Wayne Philp" and informed that the grievance committee "met today Thursday 06 April 2006", that the committee's opinion is "that Mr. Philp's behavior appears to be unusual and warrants clinical investigation", and that "we recommend that Mr. Wayne Philp be referred for psychological evaluation..."

Please note:

1. I never sat before a grievance committee to respond to any complaints;
2. I was never given any formal notice, or told what the "complaints" were, or told who made the complaints against me;
3. The grievance committee met in my absence, and reached the concluding opinion that some observed behavior of me was unusual and needed clinical investigation;
4. I was never told or advised what "behavior" the grievance committee have selected to view; and
5. It was only after the grievance committee reached their decision and made up their collective minds, then they decided to call me to sit before the grievance committee on 4.19.2006

- Dr. Raymond Adebiyi's 4.10.2006 email to me had "Subject: Complaint" and read:

Dear Mr. Philp, Please stop by my office as soon as you can.

- Dr. Jorge Rios's 4.12.2006 email to me had "Cc: Adebiyi, Raymond", "Subject: Meeting", and read:

Please call my office (extension 6248) to schedule a meeting.

- Dr. Raymond Adebiyi's 4.13.2006, 2:49 PM email to me had "Cc: Rios, Jorge; Sharma, Davendra; Perri, Dr. Nancy; Fernandez, Dr. Enrique", "Subject: Grievance Decision" Complaint" and read:

Dear Mr. Philp, Please stop by to speak with me at your earliest convenience regarding the complaints made against you. Please treat as extremely urgent.

Please note:

1. Shortly after receiving that email I visited Dr. Adebiyi; we had no discussion; instead, he immediately sent me to see Dr. Rios (interim Executive Dean), whose initial words to me were, "you have come up on my radar...I have a lot of paper on you...there are some complaints against you."
2. Thought I asked, no complaints were shown and no accusers were identified to me.

■ Karen Thomas's (secretary in dean's office) 4.13.2006 email to me had "Subject: MEETING" and read:

Mr. Philp, Can you please come to a meeting on Wednesday, April 19, 2006 at 12:00 noon in the Executive Dean's Office with Drs. Jorge Rios, Davendranand Sharma, Jon Bolaski and Raymond Adebiyi? Thanks, Karen

■ Dr. Raymond Adebiyi's 4.19.2006 email to me had "Subject: Meeting" and read:

REMINDER

We will meet with Dr Rios at 12.00 today.

Please note:

1. I met with Dr. Rios, in the presence of Drs. Adebiyi, Sharma, and Bolaski.
2. Dr. Rios expressed his opinion that he thought I was "abnormal" and that "something was wrong with you..."
3. Under the threat of not allowing me to come back to school and start 2nd semester, Dr. Rios compelled me to go and get a "psychological evaluation" because he "wanted to make sure nothing is wrong with you...and you are ok."

■ Upon returning to Dominica from break, I attempted to register for classes (2nd semester) on 5.12.2006, but was barred from doing so. I was instructed to see Dean Rios for clearance to register. He advised he was too busy when I approached him and told me to come back at noon; then at noon told me to leave the registration matter until Monday (15th) and that I will have to meet with the grievance committee first.

■ On Monday 5.15.2006, I sat before the grievance committee; thereafter, I informed Dr. Rios of that sitting and he told me to "go and register."

■ On 7.26.2006, I received from the campus post office Dean Rios' letter dated June 21, 2006, which among other things stated I was "placed on disciplinary probation for the duration of your studies at Ross University" and warned that, "Should you ever become engaged in any further altercation(s) or be found guilty of any behavior considered unbecoming of a medical student, you will be summarily dismissed from Ross University."

■ On 12.15.2006, after sitting my final exam (end of 3rd semester) I went to see Dr. Adebiyi, having been told just before I began my exam to do so by Dr.

Sharma. I met Dr. Adebiyi in his office whereupon he immediately said to me: "I have some more complaints against you." I asked him if I can see those complaints; but none was shown to me. He asked me if I was familiar about any complaints and I told him "No." He attempted to talk about some complaint, but appeared somewhat confused, then said to me, "Oh, that must be the last semester."

- Dr. Raymond Adebiyi's 1.25.2007 email to me had "Subject: Complaint" and read:

Wayne, Would you please see me sometime tomorrow morning, between 0900am and 1100am? I look forward to seeing you.

- On 1.26.2007, I met Dr. Adebiyi in his office and was informed to go before the Grievance Committee

- Dr. Raymond Adebiyi's 1.26.2007, 3:00 PM email to me had "Cc: Riviere, Mervin", "Subject: RE: Complaint" and read:

Please meet with the committee at 12.15pm on Tuesday 30 January 2007.

- Dr. Raymond Adebiyi's 1.26.2007, 3:10 PM email to me had "Cc: Riviere, Mervin", "Subject: RE: Complaint" and read:

Hi Wayne, Please change the time to 12.30pm. That will probably give you time to grab a quick lunch! Best wishes.

- Evener Williams' (Executive Assistant to Dr. Coleman) 2.27.2007, 3:50 PM email to me had "Cc: Coleman, Mary; Myers, Harriet", "Subject: MEETING ARRANGED WITH DR MARY COLEMAN, DEAN TUESDAY MARCH 1ST", and read:

Dear Mr Philp, I would like to confirm that a meeting has been scheduled for you to meet with Dr. Coleman, Dean on Thursday, March 1st 2007 in Dr Coleman's office. Also present will be Dr, Harriet Myers, Associate Dean, Student Affairs. Can I please ask you to acknowledge receipt of this email and confirm that you will be available to attend this meeting. I look forward to hearing from you.

- Dr. Mary Coleman's 2.27.2007, 9:57 PM email to me had "Cc: Myers, Harriet; Williams, Evener", "Subject: meeting", and read:

Wayne, please work with My assistant, Anne Williams, to set up a meeting with me and Dr. Myers as soon as possible. Thank you.

- Evener Williams' 2.28.2007, 7:31 AM email to Mary Coleman and me had "Cc: Myers, Harriet", "Subject: RE: meeting", and read:

Dr. Coleman, I am waiting a response from Mr Philp.

- Dr. Mary Coleman's 2.28.2007 7:33 AM email to Evener Williams and me had "Cc: Myers, Harriet", "Subject: RE: meeting", and read:

Thanks, Anne. Harriet, perhaps we can go to the classroom where he parks and notify him in person.

▪ My 2.28.2007, 12:53 PM email reply to Evener Williams had "Subject: RE: meeting" and read: *Evener Williams, Dr. Myers came to classroom 4 and has advised of our meeting at 12:30PM tomorrow (March 1st, 2007) in Dr. Coleman's office. Thank you.*

▪ On 3.1.2007, I met with Dean Mary Coleman and Associate Dean Harriet Myers. Dean Coleman told me she was expelling me from the medical school. I asked why was I being expelled and Dean Coleman answered as follows: that she got a lot of complaints against me; that I have met with the grievance committee and they recommend that I be expelled; that she was not going to go over anything with me. I asked Dean Coleman who made the complaints against me; she replied "we can't tell you." I asked Dean Coleman what were the complaints and she said, "I am not going to go over this with you." I asked if I can see the complaints, but Dean Coleman did not show any to me nor gave me any specifics of any complaints; she specifically said, "No! ...we are not going to go through this again with you." I stated to Dean Coleman that I had not violated any expulsion-related stipulations in the Student Handbook nor was I ever brought before the Student Honor Council. Thereupon, Dr. Myers told me that I was "abnormal," that my behavior was "deviant," and that I was psychotic.

[B] THE FOLLOWING HIGHLIGHTS PERSISTENT AND DISTRESSING BEHAVIORS I ENDURED:

▪ Around 3:05 AM, Sunday, 1.8.2006, the day before I officially began classes, I was suddenly awakened (actually frightened) from my sleep by the loud noisy talking and disrespectful, offensive, inappropriate language ("shit...shut the fuck up...fucking...") of Justin Bogwu (**Nigerian**, but said he was from Texas). On Monday, 1.9.2006, I delivered a complaint to Joy Adrien (Housing Director, RUSM) advising her of the inappropriate, unprofessional behavior [contrary to Ross University Honor Code pledge; contrary to the quiet, peace, quality, and dignity of the University and housing environment] and the "harassment, disruptive, and threatening" behavior of Justin Bogwu [and 2 or 3 other individuals as they stood outside my room's window/door). I advised Joy Adrien that the same Justin Bogwu had on a prior occasion engaged in the same loud, noisy, disturbing talking, and thereafter, upon seeing me, would stare at me in a very intimidating, threatening manner.

I was not given a new residence location as I requested.

▪ On 1.10.2006, while standing in the line at the bookstore counter/cashier I was hit on my back by a pair of dirty sneakers that Clint Osborn had hanging off his backpack. I advised him about his swinging his sneakers as he did and about being hit; he offered no apology, but became rude and arguing with me. Walking

pass Clint Osborn as I left the bookstore, he stated to me "what are you looking at" in a very angry, aggressive manner. I advised him to not try to start problems/altercations with me or others. Then to my surprise Clint Osborn left the line in which he was standing, walked after and towards me, and came up to my face in a very confrontational, arguing, aggressive, hostile, manner. This behavior was immediately reported to the RUSM security officer in whose presence Clint Osborn made the following statements: (a) that he heard about and know of me and that "he (referring to me) has problems with everybody; (b) that "he (referring to me) is not going to last here (at RUSM)"; and (c) referring to himself, stated, "I am going to file a complaint against you because you are filing a complaint against me".

A detailed written complaint of that bookstore incident was given to the Ross Chief of Security Mr. Edmund Darroux on 1.15.2006 and to Chairman of Grievance Committee, Dr. Raymond Adebisi (**also Nigerian**) on 1.24.2006.

- In that same 1.24.2006 complaint to Chairman Adebisi, I advised him of the 1.20.2006 classroom incident where student Ms. Prishutova, sitting behind me, kept yawning at my back.
- On Wednesday, 2.15.2006 around 7:45 AM, I advised student Ofonime Essien (**Nigerian**) that for the past two weeks he has engaged in the same behavior of leaving his "assigned" seat, coming over to my area to talk with Bennett Okororie (**Nigerian**) who sits in row behind me, but at the same time blocking the aisle so I could not freely leave or return to my seat. His response to me was "you need to say excuse...you need to say excuse...don't tell me what to do..." I advised Ofonime Essien that what he was doing and his behavior was coming across as passive aggression and harassment, whereupon he said to me "deal with it!" At 11:00 AM as I returned to my seat from break a female student (same clique of Essien and Okororie) was standing in the same place as Ofonime Essien does and talking to Bennett Okororie, and as I tried passing behind her she turned around and bumped into me, then started a loud/yelling talk to me. Then, in a very angry, threatening, provoking manner, Bennett Okororie stated to me "you are an ass...you are an ass!!"

On 2.15.2006, after classes, I went and report the incident with Ofonime/Bennett/female student to grievance committee chairman Dr. Adebisi. He advised that if it happens again I should give a written report to Ross security for him.

Despite my conversation with Ofonime Essien on 2.15.2006, he engaged in the exact behavior with Bennett Okororie on Thur. 2.16.2006 and on Fri. 2.17.2006.

On 2.17.2006, I emailed a written complaint to security officer Edmund Darroux about the repeated harassment and threatening behavior of Ofonime Essien and Bennett Okororie.

- On 3.2.2006, I brought the persistent loud coughing of student Ron Cheng (from Texas also) to the attention of the Anatomy lab instructor "Sam"; he advised that I take the matter to the Director of Anatomy Dr. King (also Asian). After classes I visited and advised Dr. King that even when I changed seats Ron Cheng would end up sitting behind me and continue with his persistent, loud, annoying cough and that such has been going for the past week. Dr. King got argumentative and angry with me; he accused me of making false statement about student Ron Cheng; he said that I was wrongfully accusing Ron Cheng of harassing me; and he expressly threatened to file a complaint on behalf of Ron Cheng with the grievance committee against me. The same disturbing coughing behind me continued even through 2nd semester,
- On 4.5.2006, while Dr. Welke had us pull numbers from her, the same student Bennett Okororie verbally attacked and physically pushed away my hand so that I could not pull my number from Dr. Welke
- On 4.6.2006, female Indian/Pakistani student kept bumping/rubbing up against me. She followed me and did the same even when I moved to different location in the classroom/Anatomy lab. When I asked her to stop she told me "you are an asshole!"
- On Friday, 7.28.2006, now 2nd semester, at the start of the Physiology Shelf Review class, Geoffrey Pazder (2nd semester student) came to sit in the back section of the class where I sat; he placed his chair directly in front of me, blocking my view to the front/lecturer; he opened a box of food and started eating in front of me as the class progressed; and throughout most of the lecture/review Geoffrey Pazder kept up a constant disruptive talking which prevented me for properly listening to the lecturer. His behavior was disturbing and rather unusual because he had the entire hour before to eat lunch, but chose to bring his food in and started to eat it in front of me at the start of and during the Physiology review class. On Monday, 7.31.06, I sat facing the wall in the back of the class to do my studying. The same Geoffrey Pazder came and placed himself in front of me in the small space between the wall and me. He started yawning and making loud annoying yawning sounds; he kept rubbing/scratching his body and scratching his head; he kept doing all kind of body movement; and he kept ruffling paper. This was very annoying, disruptive, distraction, and prevented me from studying. Then on Tuesday, 8.1.2006, I went for break and came back for the 10:00 AM Anatomy Shelf Review class. My school bag and items were moved and the same Geoffrey Pazder took and sat exactly in the place/chair where I was sitting. I sat at the available chair/desk in front. Geoffrey Pazder started to make loud coughs and grunting sounds behind me. This again was very annoying, disruptive, and prevented me from following the lecture.

In the afternoon of 8.1.2006, I hand delivered a complaint letter ("Re: The Stalking/Harassing, Disruptive Behavior of Geoffrey Pazder) to the Acting

Assistant Dean for Student Affairs, Dr. Harriet Myers. I was called to her office and she questioned me about the content of the letter.

- A couple of days after 3rd semester started (on or around 9.4.2006) a female moved from her seat and came to sit directly behind me. She began doing a loud, persistent coughing behind me, every day. In our talk she advised me that she was Polish like the Pharmacology instructor Dr. Szarek (more below).
- On Thursday, 9.7.2006, now 3rd semester, before the start of the 2pm class, I sat in the front row studying my text. Art Toups (Student Honor Council President) brought a set of sign-up sheets and sat it down on the desk right in front of me, whereupon a group of students gathered exactly next to me. One student placed his sheet directly on top of my study document and began writing on it. When I asked Art Toups why he didn't use the unoccupied part of the desk or the open empty table in the front of the classroom, he and the student who placed his sheet on my study document started to argue with me. On 9.11.2006, a written complaint of the incident was sent to Dr. Sharma (student counselor/advisor), wherein (a) I reminder him of Dr. Rios's warning to summarily dismiss me should I be involved in any altercation(s), (b) noticed him of the student behaviors appearing to harass/provoke and elicit a response from me, (c) expressed my wish to avoid "altercation(s), and (d) specifically asked that he advise the IT Services (Mr. Crispin Wallace) to grant me access to the off-campus media site so I could follow classes and study from my dorm.

Dr. Sharma's directed me to place my request to Dr. Harriet Myers, Assistant Dean for Student Affairs (Acting).

- My 9.15.2006 letter to Dr. Myers ("Re: Special Need: Off-Campus Media Site Access) advised of the harassing/provoking incidences from other students, reminded of Dr. Rios warning to dismiss me should I be involved in any further altercation(s), advised of my talk/complaint to Dr. Sharma, advised of my effort to ameliorate my situation and to prevent incidences and complaints, and specifically requested access to the off-campus media site.

Dr. Myers did not approve, but deny me access to the off-campus media site.

- On 12.15.2006, Dr. Sharma, knowing what I have been going through with Dr. Adebiyi and the grievance committee, told me as I sat to begin my final exam that Dr. Adebiyi (chairman of the grievance committee) wanted to see me. The action of Dr. Sharma served to create more worry and distress for me and impeded my clear focus and concentration on my exam.
- At the start of my 4th semester (around January 6, 2007), I decided to move away from the coughing Polish female student sitting behind me and went to the back row at the opposite end of the classroom; an area I noticed was sparsely populated and very quiet. Soon after, the environment began to change: (a) a

female student (Indian ethnicity) comes to sit in front of me and on every occasion would do her hair-dressing (pull hair back in pony tail, put tie on it, and/or curl and ball up her hair [in fact, this female hair twisting in front of me started in the 1st semester]; (b) concurrently an individual male student (not of the 4th semester class) kept repeatedly going in and out of the classroom, in front of me and passing behind me during the lecture (Microbiology); (c) large numbers of student would gather in the hallway at the door behind me and would engage in loud, disruptive, noisy talking/laughing, making it very difficult for me to hear the lecture; (d) once as I sat studying quietly another female student left her seat, stopped at the end of my desk, then suddenly and startlingly repeat banged her stack of papers on the desk. All these incidents, particularly the loud noisy talking/laughing outside the classroom door, made it extremely difficulty for me to listen and follow the lecture and to focus and concentrate of learning and studying.

My 2.23.2007 and 2.25.2007 e-mails brought the situation to the attention of Dr. Adebiyi, Dr. Sharma, and security officer Edmund Darroux

- On March 1, 2007, I met with Dean Coleman and Dr. Myers and was told I am dismissed from the school

[C] THE FOLLOWING HIGHLIGHTS UNUSUAL, UNPROFESSIONAL, BIAS, ABUSIVE, CRUEL, VICTIMIZING TREATMENT I RECEIVED FROM ROSS SCHOOL OFFICIALS/ADMINISTRATION:

- At my 3.2.2006 meeting with Director of Anatomy Dr. King, upon informing him the persistent loud coughing of student Ron Cheng, he became very irate and hostile towards me, he was extremely bias, he accused me making false statement against and of accusing student Ron Cheng of harassing me, and to my surprise he threatened that he was going to file a complaint with the grievance committee against me on behalf of Ron Cheng.

- During my 4.19.2006 meeting with Dr. Rios and others, he told me he think I was "abnormal" and that "something was wrong with you"; and under the threat of terminating my enrollment, he coerced me to go for "psychiatric evaluation" because, as said, he "wanted to be sure that nothing was wrong with you...and that you are ok."

- On 10.5.2006 during class break I went to the front of the class and ask Dr. Szarek (Pharmacology instructor) a question for clarification; he did not offer an answer, but disregardingly, insultingly, and embarrassingly (in front of the class) ordered me to go back to my seat.

- On 11.30.2006 I sent an email request to Dr. Szarek for an explanation; he sent me his email reply 30 days later (12.20.06) and stated that I could used the explanation for the exam, though the exam was long passed.

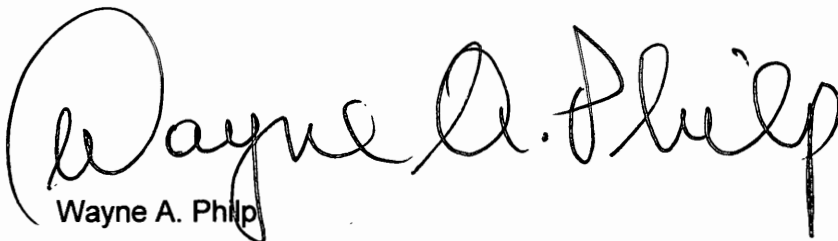
- On 12.15.2006, just before I began my final exam, Dr. Sharma told me that Dr. Adebiyi wanted to see me. Upon my asking for the reason, Dr. Sharma said it "wasn't a big deal." After the exam I met Dr. Adebiyi in his office, whereupon he said to me that he "have some more complaints against you." I asked what were the complaints; but none was shown to me nor was any specifics given to me.

Dr. Adebiyi, knowing that I was still grieving from my mother's death in May, and having observed my conduct of patience, tolerance, and self-control, then proceeded to tell me about himself. He recalled his experience as per wearing different color-coded lab coats at the medical school he attended in the US. Then stated he was a person who does "not get angry easily..."; that "it takes a lot to get me angry..."; that his mother always tell people how he is "quiet" and does"... not bother anyone...but when people push me I get angry...I go in a rage and never stop..."

That type of talk from Dr. Adebiyi was insensitive, distressing, and psychologically harassing. For at the time I was still grieving my mother's death; Dr. Adebiyi would introduce the topic of "mother" and proceed in a conversation to associate "mother" with "get angry", with "go in a rage and never stop", and with being pushed by other people. Indeed, Dr. Adebiyi knew that I was not the one creating problem or bothering anyone at the school, and that for almost the entire 1st year I was the person being harassed, abused, annoyed, and being provoked and pushed by others.

- It can be noted in Dr. Mary Coleman's 2.28.2007, 7:33 AM email, wherein she uses the impersonal, unprofessional phrase of "where he parks" to describe me being in the classroom.

- On 3.1.2007, when Dean Mary Coleman told me I was being expelled, that she would not show me any complaints, that she would not tell me who made complaints against me, that she would not go over or through anything more with me, and I stated to Dean Coleman that I had not violated any expulsion-related stipulations in the Student Handbook nor was I ever brought before the Student Honor Council, thereupon, Associate Dean Dr. Harriet Myers told me, "you are abnormal..., your a deviant person and you have psychotic behavior."



Wayne A. Philp

Civil Action Case Number: 3:14-cv-00556-JAP-DEA